

Civil Action Docket  
#

FILED  
UNDER  
SEAL

UNITED STATES  
DISTRICT COURT

FOR THE JUDICIAL  
DISTRICT OF  
MASSACHUSETTS

EASTERN DIVISION  
(BOSTON)

U.S. DISTRICT COURT  
DISTRICT OF MASS.

2022 DEC -5 PM 1:16

FILED  
IN CLERKS OFFICE

HURRY  
UP.

USMS  
SCREENED

Jane Doe 2 by "next friend"  
petitioner Jane Doe

v.

Robert Farrell, clerk of  
District Court et al

EQUITY, TRO, Article III  
Constitution of United  
States, Federal Question  
habeas corpus

COMPLAINT, Case

Dated: Friday, December 2, 2022

251420344

# AFFIDAVIT

I declare under penalty of perjury the within facts are true by personal knowledge

Dated: Friday December 2, 2022

Signed  Rose

Shushean Wong, 419 Old Colony  
Avenue, #440, South Boston,  
Massachusetts, 02127

annexed:

Motion - in forma pauperis

Motion - T.R.C.

Motion - to seal case  
plus civil cover sheet

- ⑤ I am under the indispensable necessity of acting according to the best dictates of my own judgement,
- ⑥ after duly weighing every consideration that can occur to me
- ⑦ which has been done on this occasion.
- ⑧ The extreme importance of this case, and my desire of being explicit beyond the danger to be misunderstood,
- ⑨ I hope will justify me in stating my observations in a systematic manner.
- ⑩ I therefore, judges of district court, submit to you the followings: Annex 2

Jane Doe2, now before  
Boston District Court begs  
leave to premise.

- ① That is much my inclination  
to receive with all possible  
respect every act of the  
courts of the United States.
- ② That I never could find  
myself in a more painful  
situation than now to be  
obliged to object to the  
conduct of the district court  
clerk and the delay and  
injury it has caused me.
- ③ But however lamentable a  
difference in opinion  
really may be,
- ④ or with whatever difficulty  
I may have formed an  
opinion,

## Plaintiff

Jane Doe 2 by "next friend"  
petitioner Jane Doe

## Defendants

- ① Robert Farrell  
Clerk of Boston District Court  
1 Courthouse Way  
Boston, Massachusetts
- ② Francis Castilla  
Deputy clerks, Boston  
District Court  
1 Courthouse Way  
Boston, Massachusetts
- ③ Rachael Pollins  
U.S Attorney,  
District of Massachusetts  
1 Courthouse Way  
Boston, Massachusetts

## JURISDICTION

- [A] The within case arises under Article III of Constitution which limits the judicial power to cases enumerated therein.
- [B] Jane Doe<sup>2</sup> asserts the judicial power of United States does not extend to defendants' office of clerk of Boston District Court
- [C] Defendants assert the judicial power does extend to their office of clerk
- [D] Jane Doe<sup>2</sup> asserts the right to sue within by "next friend" petitioner Jane Doe, to preserve jurisdiction of Jane Doe<sup>2</sup>'s habeas corpus sued out by same "next friend" petitioner, Jane Doe.



RIGHT OR TITLE  
OF JANE DOE 2

To bring entire whole  
ORIGINAL habeas corpus  
APPLICATION to Boston  
District Court on Thursday,  
October 13, 2022  
(See next page.)

To have clerk do ministerial  
duty under Article III, to  
enroll entire whole case on  
regular civil docket and  
bring to judge to do, all as  
a matter of course.

FACTS NECESSARY  
TO SUPPORT  
RIGHT OR TITLE

- ① Jane Doe 2 brings habeas  
corpus to Boston court  
described by next page.

Civil Action Docket  
#22-cv-11694

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UNDER  
SEAL

UNITED STATES  
DISTRICT COURT

RCS

FOR THE JUDICIAL  
DISTRICT OF  
MASSACHUSETTS

ex parte: Jane Doe2  
habeas corpus applicant

ORIGINAL habeas corpus  
APPLICATION of Jane Doe2  
habeas corpus applicant, by  
Jane Doe, "next friend"  
petitioner, brought to  
court: Thursday, October  
13, 2022

ORIGINAL  
habeas corpus APPLICATION

Dated: Thursday, October 13, 2022



- ② Clerk decides to construe Article III and enters contemporaneously foreign case, not case brought to court  
(See next page)  
for docket
- ③ Judge to whom case is assigned refuses to issue habeas corpus on basis of official docket record
- ④ and thereby Jane Doe 2 remains in custody even though she has brought VALID habeas corpus, part of supreme law of land.
- ⑤ Jane Doe 2's habeas corpus is not entered on official regular civil docket clearly evident, easily understood as ministerial act of clerk.

## DEMAND FOR RELIEF

Issue TRO to defendants  
to prohibit unconstitutional  
exercise of judicial power.

to prohibit unconstitutional  
ommission by defendants  
to do ministerial duty  
mandated by Article III,

to enroll on regular civil  
docket clearly evident,  
easily understood habeas  
corpus brought to court  
Thursday, October 13, 2022.